

Seyfarth Shaw LLP
Christian J. Rowley (SBN 187293)
560 Mission Street, 31st Floor
San Francisco, California 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549
crowley@seyfarth.com

Richard L. Alfred (SBN 015000) (*pro hac vice*)
Two Seaport Lane, Suite 300
Boston, Massachusetts 02210
Telephone: (617) 496-4802
Facsimile: (617) 946-4801
ralfred@seyfarth.com

Timothy M. Watson (SBN 20963575) (*pro hac vice*)
700 Milam Street, Suite 1400
Houston, Texas 77002-2812
Telephone: (713) 225-2300
Facsimile: (713) 225-2340
twatson@seyfarth.com

Attorneys for Defendants

Padilla & Rodriguez, LLP
John M. Padilla (SBN 279815)
jpadilla@pandrlaw.com
601 S. Figueroa St., Suite 4050
Los Angeles, California 90017
Telephone: (213) 244-1401
Facsimile: (213) 244-1402

Wills Law Firm, PLLC
Rhonda H. Wills (*pro hac vice*)
rwills@rwillslawfirm.com
Genevieve Estrada (*pro hac vice*)
gestrada@rwillslawfirm.com
1776 Yorktown, Suite 570
Houston, Texas 77056
Telephone: (713) 528-4455
Facsimile: (713) 528-2047

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KELLY CARROLL, Individually and On Behalf of
All Others Similarly Situated,

Case No. 3:15-CV-02321-EMC

**STIPULATION CONCERNING
DEADLINE FOR MEDIATION,
CLASS CERTIFICATION MOTION
AND HEARING AND FURTHER
CASE MANAGEMENT
CONFERENCE**

Plaintiffs,

Plaintiffs,

V.

WELLS FARGO & COMPANY, and WELLS
FARGO BANK, N.A..

Defendants.

Pursuant to Civil Local Rules 6-1(b), 6-2 and 7-12, Plaintiff Kelly Carroll (“Plaintiff”) and Defendants Wells Fargo & Co. and Wells Fargo Bank, N.A. (“Defendants” or “Wells Fargo”) hereby stipulate as follows:

1 WHEREAS, during the January 14, 2016 hearing in this matter, the Honorable Court
 2 ordered the parties in the above-referenced matter to mediation within 90 days of January 14,
 3 2016, or by April 13, 2016.

4 WHEREAS, in the Court's minute entry, the Court set certain other deadlines and
 5 hearings that the parties understood were determined in part based on the mediation deadline,
 6 since the parties and the Court discussed the desire to limit discovery costs to the extent the case
 7 could be settled.

8 WHEREAS, the parties have worked diligently to agree to a mediator and set a mediation
 9 date. The parties have agreed, subject to the Court approving the extension of the mediation
 10 deadline, to mediate with David Rottman in San Francisco, California, on June 7, 2016. June 7,
 11 2016 is the earliest date all the parties and Mr. Rottman are available for mediation.

12 WHEREAS, the parties have agreed to the stipulated dates herein, subject to approval of
 13 the Court.

14 THEREFORE, THE PARTIES AGREE AND STIPULATE TO THE FOLLOWING
 15 subject to approval by the Court:

- 18 1. The parties' are Ordered to mediate this matter by June 30, 2016.
- 19 2. The deadline for Plaintiff to file her Motion for Class Certification is extended to
 20 August 31, 2016.
- 21 3. Defendants' Opposition to Plaintiff's Motion for Class Certification is due September
 22 30, 2016.
- 23 4. Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Class
 24 Certification is due October 19, 2016.
- 25 5. The Further Case Management Conference is rescheduled from October 6, 2016 to
 26 November 17, 2016 at 1:30 PM in Courtroom 5, 17th Floor, San Francisco.

6. The Motion for Class Certification Hearing is rescheduled from October 6, 2016 to November 17, 2016 at 1:30 PM in Courtroom 5, 17th Floor, San Francisco.

7. The deadline for filing of the Further Case Management Statement is extended from September 29, 2016 to November 10, 2016.

Pursuant to Local Rule 6-2, there have been no other time modifications on the motion that is the subject of this Stipulation, and it is not anticipated that this extension will affect the schedule for the case. Also pursuant to Local Rule 6-2, the declaration of Rhonda H. Wills is attached as Exhibit A to the Stipulation.

IT IS SO STIPULATED.

Dated: March 4, 2016

By: /s/ Rhonda H. Wills
Rhonda H. Wills (*pro hac vice*)
Email: rwills@rwillslawfirm.com
WILLS LAW FIRM, PLLC
1776 Yorktown, Suite 570
Houston, Texas 77056
Telephone: (713) 528-4455
Facsimile: (713) 528-2047

John M. Padilla (Cal. Bar No. 279815)
Email: jpadilla@pandrlaw.com
PADILLA & RODRIGUEZ, L.L.P.
601 South Figueroa Street, Suite 4050
Los Angeles, CA 90017
Telephone: (213) 244-1401
Facsimile: (213) 244-1402

Dated: March 4, 2016

By: /s/ Timothy M. Watson
Timothy Watson (SBN 20963575) (*pro hac vice*)
Email: twatson@seyfarth.com
SEYFARTH SHAW LLP
700 Milam Street, Suite 1400
Houston, Texas 77002-2812
Telephone: (713) 225-2300
Facsimile: (713) 225-2340

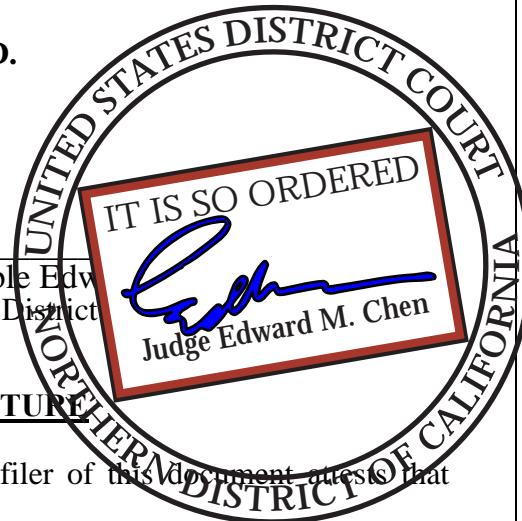
1 Christian J. Rowley (SBN 187293)
2 Email: crowley@seyfarth.com
3 SEYFARTH SHAW LLP
4 560 Mission Street, 31st Floor
5 San Francisco, California 94105
6 Telephone: (415) 397-2823
7 Facsimile: (415) 397-8549

8
9 Richard L. Alfred (SBN 015000) (*pro hac vice*)
10 Email: ralfred@seyfarth.com
11 SEYFARTH SHAW LLP
12 Two Seaport Lane, Suite 300
13 Boston, Massachusetts 02210
14 Telephone: (617) 496-4802
15 Facsimile: (617) 946-4801

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17 Dated: 3 / 4, 2016

18
19 The Honorable Edward M. Chen
20 United States District Court
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25 **ATTESTATION OF SIGNATURE**

26 Pursuant to Civil Local Rules 5-1(i)(3), the filer of this document attests that
27 concurrence in the filing of this document has been obtained from the other signatory above.

28 Dated: March 4, 2016

29 By: /s/ Rhonda H. Wills

30 Rhonda H. Wills (*pro hac vice*)
31 Email: rwills@rwillslawfirm.com
32 WILLS LAW FIRM, PLLC
33 1776 Yorktown, Suite 570
34 Houston, Texas 77056
35 Telephone: (713) 528-4455
36 Facsimile: (713) 528-2047

1 John M. Padilla (SBN 279815)
2 jpadilla@pandrlaw.com
3 **PADILLA & RODRIGUEZ, LLP**
4 601 S. Figueroa St., Suite 4050
5 Los Angeles, California 90017
6 Telephone: (213) 244-1401
7 Facsimile: (213) 244-1402

8 Rhonda H. Wills (*pro hac vice*)
9 rwills@rwillslawfirm.com
10 Genevieve Estrada (*pro hac vice*)
11 gestrada@rwillslawfirm.com
12 **WILLS LAW FIRM, PLLC**
13 1776 Yorktown, Suite 570
14 Houston, Texas 77056
15 Telephone: (713) 528-4455
16 Facsimile: (713) 528-2047

17 ATTORNEYS FOR PLAINTIFF
18 AND THE PUTATIVE CLASSES

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 Case No. 3:15-CV-02321-EMC

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**DECLARATION OF RHONDA H.
WILLS IN SUPPORT OF
STIPULATION CONCERNING
DEADLINE FOR MEDIATION,
CLASS CERTIFICATION MOTION
AND HEARING AND FURTHER
CASE MANAGEMENT
CONFERENCE**

KELLY CARROLL, Individually and On Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, and WELLS
FARGO BANK, N.A.,

Defendants.

1 I, Rhonda H. Wills, declare as follows:

2 1. I am managing partner of Wills Law Firm, PLLC, one of the firms serving as
3 Plaintiff's counsel herein. I make these statements based on personal knowledge and would so
4 testify if called as a witness.

5 2. This Declaration is submitted in support of the Parties' Stipulation Concerning
6 Deadline for Mediation, Class Certification Motion and Hearing and Further Case Management
7 Conference.

8 3. During the January 14, 2016 hearing in this matter, the Honorable Court ordered
9 the parties in the above-referenced matter to mediation within 90 days of January 14, 2016, or by
10 April 13, 2016. In the Court's minute entry, the Court set certain other deadlines and hearings
11 that Plaintiff's counsel understood were determined in part based on the mediation deadline,
12 since the parties and the Court discussed the desire to limit discovery costs to the extent the case
13 could be settled.

14 4. The parties have worked diligently to agree to a mediator and set a mediation
15 date. The parties have agreed, subject to the Court approving the extension of the mediation
16 deadline, to mediate with David Rottman in San Francisco, California, on June 7, 2016. June 7,
17 2016 is the earliest date all the parties and Mr. Rottman are available for mediation.

18 5. Therefore, the parties have agreed and stipulated to the following subject to
19 approval by the Court:

- 20 a. Mediation to occur June 30, 2016.
- 21 b. Plaintiffs to file their Motion for Class Certification by August 31, 2016.
- 22 c. Defendants' Opposition to Plaintiff's Motion for Class Certification is due
September 30, 2016.
- 23 d. Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Class
Certification is due October 19, 2016.
- 24 e. Further case Management Conference on November 17, 2016 at 1:30 PM
in Courtroom 5, 17th Floor, San Francisco.

1 f. Motion for Class Certification Hearing on November 17, 2016 at 1:30 PM
2 in Courtroom 5, 17th Floor, San Francisco.

3 g. Deadline for filing of the Further Case Management Statement is
4 November 10, 2016.

5 6. Pursuant to Local Rule 6-2, there have been no other time modifications on the
6 motion that is the subject of the Parties' Stipulation, and it is not anticipated that this extension
7 will affect the schedule for the case.

8 * * *

9 I declare under penalty of perjury under the laws of the United States and the State of
10 California that the foregoing is true and correct. Executed this 4 day of March, 2016,
11 at Houston, Texas.

12 
13 Rhonda H. Wills